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October 14, 2020

BY CM/ECF AND EMAIL

Hon. Analisa Torres United States District Court Southern District of New York Daniel Patrick Moynihan U.S. Courthouse 500 Pearl Street New York, NY 10007-1312

Re: Contrarian Capital Management, LLC v. Bolivarian Republic of Venezuela,

19 Civ. 11018 (S.D.N.Y.) (rel. Nos. 19 Civ. 3123 & 18 Civ. 11940):

Proposed Judgment

Dear Judge Torres:

We represent the Plaintiffs. We have filed today a proposed judgment, consistent with this Court's order granting summary judgment in favor of Plaintiffs, Dkt. 74, and this Court's order granting Plaintiffs an extension of time to file their proposed judgment, Dkt. 76.

Plaintiffs' proposed judgment reflects the amount due on Plaintiffs' claims as of October 14, 2020. The judgment further specifies that unpaid coupon interest and statutory prejudgment interest is to be awarded by the Court in the amount of \$173,724.16 for each day elapsed between October 14 and the day the judgment is entered. The figures for principal, unpaid coupon interest, and prejudgment interest have been shared with counsel for the Republic, who advised that they have no comments.

Respectfully submitted,

/s/ Steven F. Molo
Steven F. Molo